

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

COMMITTEE ON THE JUDICIARY,
UNITED STATES HOUSE OF
REPRESENTATIVES,

Plaintiff,

v.

DONALD F. MCGAHN II,

Defendant.

No. 19-cv-2379 (KBJ)

JOINT SCHEDULING PROPOSAL

On August 26, 2019, Plaintiff, the Committee on the Judiciary of the United States House of Representatives, filed a Motion for Preliminary Injunction or, in the Alternative, for Expedited Partial Summary Judgment. ECF No. 22. At the Court's request, the parties have met and conferred, and now propose the following:

1. Plaintiff requests that its motion be addressed as a Motion for Expedited Partial Summary Judgment. Defendant intends to file a cross-motion for summary judgment.
2. The parties propose the following briefing schedule:
 - Defendant's Opposition and Cross-Motion: Oct. 1, 2019, by 3 p.m.
 - Plaintiff's Reply and Opposition: Oct. 16, 2019
 - Defendant's Reply: Oct. 25, 2019
3. Plaintiff respectfully requests that the Court set argument on the parties' cross-motions during the week of Oct. 28, 2019, or as soon thereafter as practicable. Defendant takes no position on Plaintiff's request. The parties are available for argument any day during the

week of Oct. 28, 2019, and would be happy to discuss additional availability during the teleconference with the Court currently set for Sept. 3, 2019.

Dated: August 30, 2019

Respectfully submitted,

/s/ Douglas N. Letter

Douglas N. Letter (D.C. Bar No. 253492)

General Counsel

Todd B. Tatelman (VA Bar No. 66008)

Deputy General Counsel

Megan Barbero (MA Bar No. 668854)

Associate General Counsel

Josephine Morse (D.C. Bar No. 1531317)

Associate General Counsel

Adam A. Grogg (D.C. Bar No. 1552438)

Assistant General Counsel

Sarah E. Clouse (MA Bar No. 688187)

Attorney

OFFICE OF GENERAL COUNSEL

U.S. HOUSE OF REPRESENTATIVES

219 Cannon House Office Building

Washington, D.C. 20515

Telephone: (202) 225-9700

douglas.letter@mail.house.gov

Annie L. Owens (D.C. Bar No. 976604)

Joshua A. Geltzer (D.C. Bar No. 1018768)

Seth Wayne (D.C. Bar No. 888273455)

INSTITUTE FOR CONSTITUTIONAL

ADVOCACY AND PROTECTION

Georgetown University Law Center

600 New Jersey Avenue NW

Washington, D.C. 20001

Telephone: (202) 662-9042

ao700@georgetown.edu

*Counsel for Plaintiff Committee on the Judiciary of
the U.S. House of Representatives*

JOSEPH H. HUNT

Assistant Attorney General

JAMES M. BURNHAM

Deputy Assistant Attorney General

ELIZABETH J. SHAPIRO
Deputy Director

JAMES J. GILLIGAN
Special Litigation Counsel

/s/ Steven A. Myers
CRISTEN C. HANDLEY (MO Bar. No. 69114)
STEVEN A. MYERS (NY Bar No. 4823043)
SERENA M. ORLOFF (CA Bar No. 260888)
ANDREW BERNIE (DC BAR No. 995376)
Trial Attorneys
United States Department of Justice
Civil Division, Federal Programs Branch
P.O. Box 883
Washington, D.C. 20044
Tel: (202) 305-0648
Fax: (202) 305-8470
Email: Steven.A.Myers@usdoj.gov

Attorneys for Defendant